



COMMONWEALTH of VIRGINIA

CHERYL ROBERTS
DIRECTOR

Department of Medical Assistance Services

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January 12, 2023

Jennie Reynolds, President
Anthem HealthKeepers Plus
2015 Staples Mill Rd
Richmond, VA 23230

Re: Commonwealth Coordinated Care Plus (CCC Plus) Program – Corrective Action Plan (CAP) – Payment cycle data – CID# 20748

Dear Ms. Reynolds,

The Department of Medical Assistance Services (DMAS) monitors the accuracy and timeliness of essential reports. The Contractor is required to adhere to the general reporting requirements specified in Section 16.9.4.1 which states that the Contractor shall:

- 1) Collect and maintain 100% of all encounter data for each covered service and supplemental benefit services provided to Members, including encounter data from any sub-capitated sources. Such data must be able to be linked to the Department's eligibility data;
- 2) Develop a process and procedure to identify drugs administered under section 340B of the Public Health Service Act as codified at 42 USC 256b, as drugs dispensed pursuant to this authority are not eligible for the Medicaid Drug Rebate Program as directed in Section 4.8.8, Drug Rebates of this Contract; and,
- 3) Submit complete, timely, reasonable, and accurate encounter data to the Department within thirty (30) calendar days of the Contractor's payment date and in the form and manner specified by the Department. Standard formats, required data elements, and other submission requirements shall be detailed in its supporting documentation.
- 4) Payment cycle data must be submitted and certified according to the CCC Plus Encounter Technical Manual.
- 5) The Contractor's systems shall generate and transmit encounter data files according to the Department's requirements and any additional specifications as may be provided by the Department and updated from time to time.

Anthem HealthKeepers Plus (Anthem) was issued a Corrective Action Plan (CAP), Case ID # 20190, on June 17, 2020, for multiple quarters of non-compliance with payment cycle entry

Case ID # 20748

timeliness and payment cycle certification timeliness. Case ID #20190 was closed on August 31, 2022 following the State Fiscal Year (SFY) 2022, Quarter 3 data run.

On December 13, 2022, it was reported on the Encounter Evaluation Guide and Data Quality Score Card (DQSC), Anthem is out of compliance with the following areas for State Fiscal Year (SFY) 2023, Q1 (July 1 – September 30, 2022):

4.1	Payment Cycle Entry Timeliness	Target: 98.00%	Actual: 78.59%
4.2	Payment Cycle Certification Timeliness	Target: 98.00%	Actual: 81.23%

In addition, Anthem was out of compliance the prior quarter (SFY2022, Q4) with only 89.09% of payment cycle entries being made timely (4.1) along with only 91.74% for payment cycle certification timeliness (4.2). The failure to maintain this compliance is concerning due to the assurance by Anthem upon the closure of the prior CAP that a reconciliation report was successfully implemented and turnaround times were being met.

DMAS is committed to working collaboratively with Anthem; therefore, we are requiring Anthem to submit a CAP to DMAS for approval no later than 30 calendar days from the date of this letter. Anthem must identify the root cause(s) for the continued lack of compliance and develop a practicable project plan focused on implementing sustainable internal controls to reach and maintain compliance with requirements outlined in the contract and CCC Plus Encounter Technical Manual. DMAS will monitor Anthem’s progress on the CAP to meet the milestones and ultimately, resolve the issue. Anthem will need to provide a written update to DMAS via email by close of business every Monday. Anthem and DMAS may meet via conference call to review and discuss ongoing progress.

Anthem will be issued a 10 point violation and \$15,000 financial penalty pursuant to Section 18.1 of the CCC Plus Contract. Assessment of these points are pending. If you have additional information and/or documentation that will affect this determination, please provide this information to Jason A. Rachel, Ph. D., Division Director, within 15 calendar days from the date of this letter (“Comment Period”). Point violations will be finalized upon the expiration of the Comment Period. After this time, no additional communication will be provided by DMAS regarding the point issuance.

If you have any questions regarding these concerns, contract standards or CAP requirements, please contact ccpluscompliance@dmavirginia.gov. Please sign, date and return acknowledging receipt to ccpluscompliance@dmavirginia.gov.

Sincerely,



Jason A. Rachel, Ph.D
Integrated Care Division Director

CC: Elizabeth Smith, RN

Acknowledge agreement via signature below to address the issue regarding payment cycle data detailed in this compliance action.

Jennie Reynolds / Date

Exhibit 1 – Anthem – 2021 Point Schedule

<u>MCO</u>	<u>Area(s) of Violation</u>	<u>Previous Balance</u>	<u>Point(s) Expired</u>	<u>Point(s) Incurred</u>	<u>Current Balance</u>	<u>Sanctions pursuant to 18.2.2</u>
Anthem	16.9.4.1	15	0	10	25	\$15,000